5   placing the first computer in control of the browser application so that files from the

6   network displayed by the browser application are determined by the first computer;

7   selecting a region on a display of the first computer;

8   causing the first computer continually to capture images of the region;

9   causing the first computer to transmit the images to the control site computer; and

10   causing the control site computer to receive the images and re-transmit the images to the

11   second computer for display by the second computer.

REMARKS

FORMAL MATTERS

Fees and Authorization to Charge

A check for appropriate fees under 37 C.F.R. §§ 1.16(b) & (c) is enclosed herewith.

Authorization is also granted to charge Deposit Account No. 50-1273 for any additional fees

associated with this filing. A separate paper authorizing charging of the deposit account is

enclosed.

Summary of the Amendment

Claims 1, 7, 12, 14, and 17 have been amended. New claims 23 and 24 have been added.

SUBSTANTIVE MATTERS

Summary of the Office Action

In the Office Action, the honorable Examiner rejected claims 1-22 of the Application

under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,237,025 to Ludwig *et al.*

("Ludwig"). According to the Examiner,

> Ludwig teaches the limitations of allowing the user of the first computer 12-1 to
> select a region (snap shot such as a window) on the display of the computer 12-1,

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transmitt[ing] the associated image to the control computer 502, and the control computer 502 transmits the image to the second computer 12-2 to be displayed on its screen (display).

The Office Action, page 2, fifth numbered paragraph.

For the reasons explained below, the applicant herein (the "Applicant") respectfully submits that Ludwig does not anticipate the invention as defined in the claims.

Ludwig Does Not Anticipate The Claims

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the . . . patent claim." *Richardson v. Suzuki Motor Corp.*, 868 F.2d 1226, 1236 (Fed. Cir. 1989). See *also* MANUAL OF PATENT EXAMINING PROCEDURE § 2131 (8th ed., Aug. 2001) ("MPEP § _" hereinafter), quoting *Verdegaal Bros., supra*, and *Richardson, supra*. Because Ludwig does not disclose an "identical invention" having "each and every element" of the claims of the Application, Ludwig does not anticipate the claims.

In particular, Ludwig does not teach the limitation of a first computer controlling a browser application running on a second computer, so that the files (pages) from the network displayed by the second computer's browser application are determined by the first computer. This limitation is present in each independent claim of the Application.

Ludwig also does not teach or suggest dynamic updating of the image. Indeed, the word "snapshot" used by Ludwig clearly refers to a still image. A "snapshot" means "a casual photograph . . . [or] an impression or view of something *brief* or *transitory*." MERRIAM WEBSTER

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INC., WEBSTER'S NINTH NEW COLLEGIATE DICTIONARY 1115 (1988) (emphasis added). In

contrast, claims 5-16 and 21-24 require updating and re-transmission of the captured image.

CONCLUSION

Because of the independent and distinct reasons discussed above, the claims of the

Application are not anticipated by Ludwig.

The Applicant has made an earnest effort to bring the Application in condition for

allowance and an early notice to that effect is respectfully requested.

Respectfully submitted,

BROBECK, PHLEGER & HARRISON LLP

Dated: _1/3 0/200 2_   By: _____

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